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Attorneys for Creditor, Roosevelt Fund, L.P.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re:

EDWARD SEWON EHEE,

Debtor.

Case No. 07-40126  
Chapter 7

In re:

COMPASS FUND MANAGEMENT,

Debtor.

Case No. 07-40129  
Chapter 7

In re:

COMPASS WEST FUND L.P.,

Debtor.

Case No. 07-40130  
Chapter 7

**MOTION FOR JOINT ADMINISTRATION  
AND REQUEST FOR A STATUS  
CONFERENCE**

Date: May 3, 2007  
Time: 3:00 p.m.  
Place: Courtroom 201  
Judge: Hon. Leslie J. Tchaikovsky

TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

Roosevelt Fund, L.P. ("Roosevelt Fund")<sup>1</sup> by and through its counsel, Nixon Peabody LLP,

<sup>1</sup> Roosevelt Fund, L.P. was previously known as A.A.G. Roosevelt Fund, L.P. and its official corporate name was previously Anira Advisory Group Roosevelt Fund, L.P.

1 hereby files its motion (the "Motion") for entry of an order, substantially in the form attached hereto  
2 as Exhibit A, directing the joint administration of the above captioned chapter 7 cases and ordering a  
3 status conference to be held on May 3, 2007, or the Court's earliest convenience.

4 The ground for this motion is that entry of an order directing the joint administration of these  
5 chapter 7 cases will avoid duplicative notices, applications, and orders, thereby saving the Debtors  
6 and their creditors considerable time and expense. The Court also will be relieved of the burden of  
7 entering duplicative orders and maintaining duplicative files. Finally, supervision of the  
8 administrative aspects of these chapter cases by a single chapter 7 trustee will be simplified.

9 Roosevelt Fund's motion will be based on this Motion, the accompanying Notice of Motion,  
10 and the Memorandum of Points and Authorities in Support.

11  
12 Dated: April 9, 2007

Respectfully submitted,

13 NIXON PEABODY LLP

14  
15 By: /s/ James S. Monroe  
16 James S. Monroe, Esq.  
17 Attorneys for Creditor,  
18 Roosevelt Fund, L.P.  
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# **EXHIBIT A**

James S. Monroe, Esq. (SBN 102328)  
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Attorneys for Creditor, Roosevelt Fund, L.P.

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

In re:

EDWARD SEWON EHEE, et al.,

Debtors.

Case No. 07-40126

Jointly Administered

Chapter 7

**[PROPOSED] ORDER ON MOTION FOR  
JOINT ADMINISTRATION AND  
REQUEST FOR A STATUS CONFERENCE**

Date: May 3, 2007

Time: 3:00 p.m.

Place: Courtroom 201

Judge: Hon. Leslie J. Tchaikovsky

Upon the motion ("Motion")<sup>1</sup> of Roosevelt Fund, L.P. ("Roosevelt Fund")<sup>2</sup> for entry of an order, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") for an order directing the joint administration of the Chapter 7 Cases; it appearing that the relief requested is in the best interests of the Debtors' estates, their creditors and other parties in interest; it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 175 and 1334; it appearing that this proceeding is a core proceeding pursuant to 28 U.S.C. § 157 (b)(2); it

<sup>1</sup> Capitalized terms used but not otherwise defined shall have the meanings set forth in the Motion.

<sup>2</sup> Roosevelt Fund, L.P. was previously known as A.A.G. Roosevelt Fund, L.P. and its official corporate name was previously Anira Advisory Group Roosevelt Fund, L.P.

1 appearing that venue of this proceeding and this Motion in this District is proper pursuant to 28  
 2 U.S.C. §§ 1408 and 1409; notice of this Motion and the opportunity for a hearing on this Motion was  
 3 appropriate under the particular circumstances and that no other or further notice need be given; and  
 4 after due deliberation and sufficient cause appearing therefore, it is hereby ORDERED:

- 5 1. The Motion is granted in its entirety.
- 6 2. Pursuant to Rule 1015(b) of the Bankruptcy Rules, the above captioned Chapter 7  
 7 Cases are consolidated for procedural purposes only and shall be jointly administered by the Court.
- 8 3. Nothing contained in this Order shall be deemed or construed as directing or otherwise  
 9 affecting the substantive consolidation of any of the above captioned chapter 7 cases.
- 10 4. The caption of the jointly administered cases shall read as follows:

12 In re: 13 EDWARD SEWON EHEE, <u>et al.</u> , 14 Debtors.	Case No. 07-40126 Jointly Administered Chapter 7
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- 15
- 16
- 17 5. That a docket entry shall be made in each of the above-captioned cases substantially as  
 18 follows:

19  
 20 “An order has been entered in this case directing the procedural consolidation and  
 21 joint administration of this chapter 7 case. The docket in Case No. 07-40126  
 should be consulted for all matters affecting these cases.”

- 22 6. The terms and conditions of this Order shall be immediately effective and enforceable  
 23 upon its entry.

- 24 7. To the extent that any affiliates of the Debtors subsequently are subject to a chapter 7  
 25 proceeding, the relief granted pursuant to this Order shall apply to such debtors and their respective  
 26 estates.

- 27 8. A status conference will be held at the U.S. Bankruptcy Court for the Northern District  
 28 Of California (San Francisco Division), 235 Pine Street, 19th Floor, San Francisco, CA 94104,

1 Courtroom No. \_\_, on May \_\_, 2007 at \_\_:\_\_ a.m.

2 9. The requirement set forth in Rule 9013-1 of the Local Bankruptcy Rules for the  
3 Northern District of California that any motion or other request for relief be accompanied by a  
4 memorandum of law is hereby deemed satisfied by the contents of the Motion or otherwise waived.  
5

6 10. The Court retains jurisdiction with respect to all matter arising from or related to the  
7 implementation of this Order.

8 \* \* END OF ORDER \* \*